



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



DEC 29 2014

Mr. Jerry Frost
Vintage California Production, LLC
PO Box 9600 Ming Ave
Bakersfield, CA 93311

Re: Notice of Minor Title V Permit Modification
District Facility # S-1327
Project # S-1144151

Dear Mr. Frost:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued S-1237-41-4 into the Title V operating permit. This modification authorized designating a 4.25 MMBtu/hr gas-fired heater treater as a non-compliant dormant emissions unit (DEU).

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued S-1237-41-4, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Thank you for your cooperation in this matter.

Sincerely,


Arnaud Marjollet
Director of Permit Services

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

TITLE V APPLICATION REVIEW

Minor Modification
Project #: S1144151

Engineer: Steve Davidson
Date: December 23, 2014

Facility Number: S-1327
Facility Name: Vintage California Production, LLC
Mailing Address: PO Box 9600 Ming Ave
Bakersfield, CA 93311

Contact Name: Jerry Frost
Phone: (661) 869-8179

Responsible Official: Dewayne Smith
Title: Surface Operations Manager

I. PROPOSAL

Vintage California Production, LLC (VCP) is proposing a Title V minor permit modification to incorporate Authority to Construct (ATC) # S-1327-41-3 into Vintage's Title V permit. The ATC authorized designating a 4.25 MMBtu/hr gas-fired heater treater as a non-compliant dormant emissions unit (DEU).

Conditions were placed on the permit to ensure the units meet the requirements of District Rules.

II. FACILITY LOCATION

The heater treater is located at the Heavy Oil Western Stationary Source, North Antelope Hills Field. (SE ¼ Sec15, T27S, R19E).

III. EQUIPMENT DESCRIPTION

Authority To Construct:

S-1327-41-3: MODIFICATION OF 4.25 MMBTU/HR GAS-FIRED HEATER TREATER CONSISTING OF TWO BURNERS EACH RATED 1.75 MMBTU/HR AND ONE BURNER RATED AT 0.75 MMBTU/HR (NORTH ANTELOPE HILLS); DESIGNATE AS NON-COMPLIANT DORMANT EMISSIONS UNIT

Post Project Permit to Operate:

S-1327-41-4: 4.25 MMBTU/HR GAS-FIRED HEATER TREATER CONSISTING OF TWO BURNERS EACH RATED 1.75 MMBTU/HR AND ONE BURNER RATED AT 0.75 MMBTU/HR (NORTH ANTELOPE HILLS)

IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to the Title V permit is considered to be and Minor Modifications and requires no public review.

V. APPLICABLE REQUIREMENTS

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

The ATC authorized designating a 4.25 MMBtu/hr gas-fired heater treater as a non-compliant dormant emissions unit (DEU). Vintage has disconnected the fuel line to ensure that the equipment does not operate while dormant.

Condition # on Existing PTO S-1327-41-2	Condition # on Propose PTO S-1327-41-4	Condition is New, Modified, or Removed	Reason for Change from Current PTO
--	2,3, and 4	New	Dormant permit unit conditions added to the permit

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include;

- a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

Because these permit revisions meet all the above criteria, this is a Minor Modification.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

VIII. ATTACHMENTS

- A. Proposed Modified Title V Operating Permit
- B. Authority to Construct
- C. Emissions Increases
- D. Application
- E. Previous Title V Operating Permit

ATTACHMENT A

Proposed Modified Title V Operating Permit #
S-1326-1327-41-4

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1327-41-4

EXPIRATION DATE: 02/28/2017

SECTION: 15 **TOWNSHIP:** 27S **RANGE:** 19E

EQUIPMENT DESCRIPTION:

4.25 MMBTU/HR GAS-FIRED HEATER TREATER CONSISTING OF TWO BURNERS EACH RATED 1.75 MMBTU/HR AND ONE BURNER RATED AT 0.75 MMBTU/HR (NORTH ANTELOPE HILLS)

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
2. The fuel supply line shall be physically disconnected from this unit. [District Rule 4307] Federally Enforceable Through Title V Permit
3. This equipment shall not be operated for any reason until an Authority to Construct permit is issued approving all necessary retrofits required to comply with the applicable requirements of District Rule 4307 and all other applicable District regulations. [District Rule 4307] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

ATTACHMENT B

Authority to Construct
#S-1327-41-3



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT



AUTHORITY TO CONSTRUCT

PERMIT NO: S-1327-41-3

ISSUANCE DATE: 10/27/2014

LEGAL OWNER OR OPERATOR: VINTAGE PRODUCTION CALIFORNIA LLC

MAILING ADDRESS: 9600 MING AVE, SUITE 300
BAKERSFIELD, CA 93311

LOCATION: HEAVY OIL WESTERN, KERN COUNTY
CA

SECTION: 15 **TOWNSHIP:** 27S **RANGE:** 19E

EQUIPMENT DESCRIPTION:

MODIFICATION OF 4.25 MMBTU/HR GAS-FIRED HEATER TREATER CONSISTING OF TWO BURNERS EACH RATED 1.75 MMBTU/HR AND ONE BURNER RATED AT 0.75 MMBTU/HR (NORTH ANTELOPE HILLS): DESIGNATE AS NON-COMPLIANT DORMANT EMISSIONS UNIT

CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. Operation of the unit is not authorized until modifications are made to comply with District Rules as authorized by an Authority to Construct. [District Rule 2010]
3. The fuel line shall be physically disconnected from the unit. (Adjust as necessary) [District Rule 2080]
4. While dormant, normal source testing shall not be required. [District Rule 2080]
5. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services

S-1327-41-3 : Oct 27 2014 11:48AM - DAVIDSOB : Joint Inspection NOT Required

ATTACHMENT C

Emissions Increases

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
S-1327-41-4	0	0	0	0	0
Total	0	0	0	0	0

ATTACHMENT D

Application

S-1327-41-4

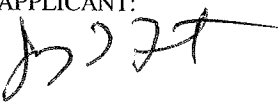
San Joaquin Valley Air Pollution Control District

www.valleyair.org

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NOV 03 2014SJVAPCD
Southern Region

Permit Application For:

☐ ADMINISTRATIVE
AMENDMENT☒ MINOR
MODIFICATION☐ SIGNIFICANT
MODIFICATION

1. PERMIT TO BE ISSUED TO: Vintage Production California LLC	
2. MAILING ADDRESS: STREET/P.O. BOX: 9600 Ming Ave CITY: Bakersfield STATE: CA 9-DIGIT ZIP CODE: 93311	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: _____ CITY: _____ _____ 1/4 SECTION 15 TOWNSHIP 27S RANGE 19E	INSTALLATION DATE: 11/3/2014
4. GENERAL NATURE OF BUSINESS: Crude Oil Production	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) Title V Administrative Amendment to incorporate ATC S-1327-41-3 as a PTO into the current Title V operating permit for S-1327.	
6. TYPE OR PRINT NAME OF APPLICANT: Jerry Frost	TITLE OF APPLICANT: HES Advisor
7. SIGNATURE OF APPLICANT: 	DATE: 11-3-14 PHONE: (661) 869-8000 FAX: (661) 869-8059 EMAIL: Jerry_Frost@oxy.com

For APCD Use Only:

EnviroTech Consultants Inc.

DATE STAMP	FILING FEE RECEIVED: \$ 19.00	CHECK#: 4452
	DATE PAID: PM 11/3/14	
	PROJECT NO: S1144151	FACILITY ID: S-1327

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San Joaquin Valley
Unified Air Pollution Control District

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

☐ SIGNIFICANT PERMIT MODIFICATION
☒ MINOR PERMIT MODIFICATION

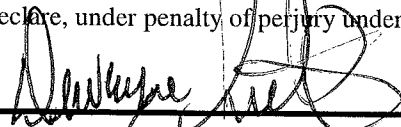
☐ ADMINISTRATIVE
AMENDMENT

COMPANY NAME: VINTAGE PRODUCTION CALIFORNIA, LLC	FACILITY ID: S - 1327
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: VINTAGE PRODUCTION CALIFORNIA, LLC	
3. Agent to the Owner: VINTAGE PRODUCTION CALIFORNIA, LLC	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial **all** circles for confirmation):

- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- ☒ Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- ☒ Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:



Signature of Responsible Official

11/3/14

Date

Dewayne Smith

Name of Responsible Official (please print)

Surface Operations Manager

Title of Responsible Official (please print)

Mailing Address: Central Regional Office * 1990 E. Gettysburg Avenue * Fresno, California 93726-0244 * (559) 230-5900 * FAX (559) 230-6061

TVFORM-009
Rev: July 2005



Vintage Production California LLC

A subsidiary of Occidental Petroleum Corporation



9600 Ming Ave, Ste. 300
Bakersfield, California 93311
Phone 661.869.8000, Fax 661.869.8059

RECEIVED

NOV 03 2014

SJVAPCD
Southern Region

November 3, 2014

Mr. Leonard Scandura
Permit Services Manager
San Joaquin Valley Unified APCD
34946 Flyover Court
Bakersfield, CA 93308

Subject: Title V Modification S-1327

Dear Mr. Scandura:

Please find enclosed a Title V Minor Modification application and a check in the amount of \$19 to incorporate ATC S-1327-41-3 into the current Title V operating permit for the Vintage Production California, LLC (VPC) Heavy Oil Western Stationary Source (S-1327).

If you have any questions or comments please feel free to contact Jerry Frost at (661) 869-8000.

Sincerely,

Jerry Frost
HES Advisor

Attachments

ATTACHMENT E

Previous Title V Operating Permit
S-1327-41-2

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-1327-41-2

EXPIRATION DATE: 02/28/2017

SECTION: 15 **TOWNSHIP:** 27S **RANGE:** 19E

EQUIPMENT DESCRIPTION:

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